

1  
2  
3  
4  
5  
6 **UNITED STATES DISTRICT COURT FOR THE**  
7 **EASTERN DISTRICT OF WASHINGTON**

8 CINDY ELLEN OCHOA, as an  
9 individual,

10 Plaintiff,

11 v.

12 SERVICE EMPLOYEES  
13 INTERNATIONAL UNION LOCAL  
14 775, an unincorporated labor  
15 association; PUBLIC CONSULTING  
16 GROUP, INC., a Massachusetts  
17 corporation; PUBLIC  
18 PARTNERSHIPS LLC, incorporated  
19 in Delaware; CHERYL STRANGE  
20 in her official capacity as  
21 SECRETARY of the  
22 DEPARTMENT OF SOCIAL AND  
23 HEALTH SERVICES, and JAY  
INSLEE, in his official capacity as  
GOVERNOR of the STATE OF  
WASHINGTON,

Defendants.

No. 2:18-CV-0297-TOR

**STIPULATED FED. R. EVID.**  
**502(d) ORDER**

1 In accordance with Fed. R. Evid. 502(d), in order to conduct and respond to  
2 discovery expeditiously, the parties agree that a privilege or protection is not  
3 waived with respect to any federal or state proceeding by a disclosure in the instant  
4 action.

5 **AGREED AND STIPULATED** to this 5th day of February, 2019.

6 s/ Caleb Jon Vandenbos  
7 Caleb Jon Vandenbos, WSBA #50231  
8 cvandenbos@freedomfoundation.com  
9 Sydney Phillips, WSBA #54295  
10 SPhillips@freedomfoundation.com  
11 FREEDOM FOUNDATION  
12 P.O. Box 552,  
13 Olympia, WA 98507-9501  
14 T: 360.956.3482  
15 F: 360.352.1874  
16 *Attorneys for Plaintiff, Cindy Ochoa*

17 s/ Michael Subit  
18 Michael C. Subit, WSBA #29189  
19 705 Second Ave, Suite 1200  
20 Seattle, Washington 98104  
21 T: (206) 682-6711  
22 F: (206) 682-0401  
23 msubit@frankfreed.com  
*Attorney for Defendant, SEIU 775*

1 s/Cheryl Wolfe

2 Cheryl L. Wolfe, WSBA # 15555

3 Senior Counsel

4 Labor and Personnel Division

5 1116 West Riverside Avenue,

6 Suite 100

7 Spokane, WA 99201

8 (509) 456-3123

9 CherylW@atg.wa.gov

10 *Attorney for Defendants, Inslee and*  
11 *Strange*

12 s/ Markus Louvier

13 Markus W. Louvier, WSBA #39319

14 Evans, Craven & Lackie, P.S.

15 818 W. Riverside Ave., Ste. 250

16 Spokane, WA 99201

17 T: (509) 455-5200

18 F: (509) 455-3632

19 mlouvier@ecl-law.com

20 *Attorney for Defendants,*  
21 *PCG and PP LLC*

**ORDER**

It is so ORDERED this 20<sup>th</sup> day of February, 2019.



*Thomas O. Rice*  
THOMAS O. RICE  
Chief United States District Judge